
**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

RUSS GODFREY, and NATALIE
GODFREY,

Plaintiffs,

v.

Case No: 5:19-cv-329 G

CSAA FIRE & CASUALTY
INSURANCE COMPANY,

Defendant.

PLAINTIFFS' FINAL WITNESS LIST

Pursuant to this Court's Scheduling Order [Doc. 15], Plaintiffs submit the following Witness List. Since discovery is ongoing, Plaintiffs reserve the right to amend and/or supplement their List based upon new information received through discovery.

No.	Name and Address	Testimony
1.	Russ Godfrey c/o Mansell Engel & Cole 204 N. Robinson Ave., 21 st Floor Oklahoma City, OK 73102	Insurance policies issued on subject property; denial of subject claim; damages caused by such denial; scope, amount and cause of damages sustained by Plaintiffs' home; history of subject property; benefits wrongfully withheld by Defendant; repairs that Plaintiffs' home required and payments made for such repairs; inspections and estimates related to Plaintiffs' home; communications with Defendant and individuals associated with Defendant; issues raised by Defendant

No.	Name and Address	Testimony
2.	Natalie Godfrey c/o Mansell Engel & Cole 204 N. Robinson Ave., 21 st Floor Oklahoma City, OK 73102	Insurance policies issued on subject property; denial of subject claim; damages caused by such denial; scope, amount and cause of damages sustained by Plaintiffs' home; history of subject property; benefits wrongfully withheld by Defendant; repairs that Plaintiffs' home required and payments made for such repairs; inspections and estimates related to Plaintiffs' home; communications with Defendant and individuals associated with Defendant; issues raised by Defendant
3.	Sayde Brooks, Claims Adjuster c/o Jerry Pignato 119 N. Robinson Ave., 11 th Floor Oklahoma City, OK 73102	Investigation, evaluation and denial of Plaintiffs' claim; nature, cause and extent of damages sustained by Plaintiffs' home; coverages applicable to Plaintiffs' claim; guidelines, standards and reference materials applicable to Defendant's handling of property claims; inspections and estimates related to Plaintiffs' home; communications with Plaintiffs and other individuals with knowledge of subject claim; issues raised by Defendant
4.	Mark Costello, Claims Adjuster c/o Jerry Pignato 119 N. Robinson Ave., 11 th Floor Oklahoma City, OK 73102	Investigation, evaluation and denial of Plaintiffs' claim; nature, cause and extent of damages sustained by Plaintiffs' home; coverages applicable to Plaintiffs' claim; guidelines, standards and reference materials applicable to Defendant's handling of property claims; inspections and estimates related to Plaintiffs' home; communications with Plaintiffs and other individuals with knowledge of subject claim; issues raised by Defendant

No.	Name and Address	Testimony
5.	Alana Hare, Claims Adjuster c/o Jerry Pignato 119 N. Robinson Ave., 11 th Floor Oklahoma City, OK 73102	Investigation, evaluation and denial of Plaintiffs' claim; nature, cause and extent of damages sustained by Plaintiffs' home; coverages applicable to Plaintiffs' claim; guidelines, standards and reference materials applicable to Defendant's handling of property claims; inspections and estimates related to Plaintiffs' home; communications with Plaintiffs and other individuals with knowledge of subject claim; topics in future Deposition Notices; issues raised by Defendant
6.	Michael White, Adjuster US Adjusting Services 4090 S. Regent Wichita Falls, TX 76308	Inspections and estimates performed at Defendant's request; guidelines, rules and restrictions applicable to work performed at Defendant's request; revenue sought or received from work performed at Defendant's request; nature, cause and extent of damages sustained by Plaintiffs' home; inspections and estimates related to Plaintiffs' home; contacts with Defendant and/or individuals associated with Defendant; issues raised by Defendant
7.	Grace McCay, Claims Adjuster c/o Jerry Pignato 119 N. Robinson Ave., 11 th Floor Oklahoma City, OK 73102	Investigation, evaluation and denial of Plaintiffs' claim; nature, cause and extent of damages sustained by Plaintiffs' home; coverages applicable to Plaintiffs' claim; guidelines, standards and reference materials applicable to Defendant's handling of property claims; inspections and estimates related to Plaintiffs' home; communications with Plaintiffs and other individuals with knowledge of subject claim; issues raised by Defendant

No.	Name and Address	Testimony
8.	April Davidson, Claims Adjuster c/o Jerry Pignato 119 N. Robinson Ave., 11 th Floor Oklahoma City, OK 73102	Investigation, evaluation and denial of Plaintiffs' claim; nature, cause and extent of damages sustained by Plaintiffs' home; coverages applicable to Plaintiffs' claim; guidelines, standards and reference materials applicable to Defendant's handling of property claims; inspections and estimates related to Plaintiffs' home; communications with Plaintiffs and other individuals with knowledge of subject claim; issues raised by Defendant
9.	Aimee Brennan, Claims Adjuster c/o Jerry Pignato 119 N. Robinson Ave., 11 th Floor Oklahoma City, OK 73102	Investigation, evaluation and denial of Plaintiffs' claim; nature, cause and extent of damages sustained by Plaintiffs' home; coverages applicable to Plaintiffs' claim; guidelines, standards and reference materials applicable to Defendant's handling of property claims; inspections and estimates related to Plaintiffs' home; communications with Plaintiffs and other individuals with knowledge of subject claim; issues raised by Defendant
10.	Stephen Butler, Claims Adjuster c/o Jerry Pignato 119 N. Robinson Ave., 11 th Floor Oklahoma City, OK 73102	Investigation, evaluation and denial of Plaintiffs' claim; nature, cause and extent of damages sustained by Plaintiffs' home; coverages applicable to Plaintiffs' claim; guidelines, standards and reference materials applicable to Defendant's handling of property claims; inspections and estimates related to Plaintiffs' home; communications with Plaintiffs and other individuals with knowledge of subject claim; issues raised by Defendant

No.	Name and Address	Testimony
11.	Paula Fairchild, Claims Adjuster c/o Jerry Pignato 119 N. Robinson Ave., 11 th Floor Oklahoma City, OK 73102	Investigation, evaluation and denial of Plaintiffs' claim; nature, cause and extent of damages sustained by Plaintiffs' home; coverages applicable to Plaintiffs' claim; guidelines, standards and reference materials applicable to Defendant's handling of property claims; inspections and estimates related to Plaintiffs' home; communications with Plaintiffs and other individuals with knowledge of subject claim; issues raised by Defendant
12.	Joseph Hough, Claims Adjuster c/o Jerry Pignato 119 N. Robinson Ave., 11 th Floor Oklahoma City, OK 73102	Investigation, evaluation and denial of Plaintiffs' claim; nature, cause and extent of damages sustained by Plaintiffs' home; coverages applicable to Plaintiffs' claim; guidelines, standards and reference materials applicable to Defendant's handling of property claims; inspections and estimates related to Plaintiffs' home; communications with Plaintiffs and other individuals with knowledge of subject claim; issues raised by Defendant
13.	Allen Lippoldt Ultimate Roofing and Construction 4321 SE 33 rd Street Oklahoma City, OK 73115	Nature, cause and extent of damages sustained by Plaintiffs' home; repairs that Plaintiffs' home required; inspections and estimates related to Plaintiffs' home; communications with Defendant and/or individuals associated with Defendant; issues raised by Defendant

No.	Name and Address	Testimony
14.	Colby Roberts Ultimate Roofing and Construction 4321 SE 33 rd Street Oklahoma City, OK 73115	Nature, cause and extent of damages sustained by Plaintiffs' home; repairs that Plaintiffs' home required; inspections and estimates related to Plaintiffs' home; communications with Defendant and/or individuals associated with Defendant; issues raised by Defendant
15.	Dusty Smith Ultimate Roofing and Construction 4321 SE 33 rd Street Oklahoma City, OK 73115	Nature, cause and extent of damages sustained by Plaintiffs' home; repairs that Plaintiffs' home required; inspections and estimates related to Plaintiffs' home; communications with Defendant and/or individuals associated with Defendant; issues raised by Defendant
16.	Sean Wiley JW Construction Management 237 NW 60 th , Suite A Oklahoma City, OK 73118	Issues and opinions referenced in report produced on October 21, 2019 per Scheduling Order [Doc. 15]
17.	Other employees or representatives of Defendant whose identities are unknown at this time	
18.	Witness needed for rebuttal of issues or evidence introduced by Defendant	
19.	Witnesses identified by Defendant to whom Plaintiffs do not object	
20.	Witnesses identified during remaining discovery	

MANSELL ENGEL & COLE

By: s/ Keith F. Givens
 Mark A. Engel, OBA #10796
 Keith F. Givens, OBA #16501
 204 North Robinson Avenue, 21st Floor
 Oklahoma City, OK 73102-7001
 T: (405) 232-4100 ** F: (405) 232-4140
kgivens@meclaw.net

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on November 4, 2019, I electronically transmitted the attached document to the Clerk of the Court using the ECF system for filing and transmittal of a Notice of Electronic Filing to the following registrants:

Gerard F. Pignato (jerry@rkcqlaw.com)
Joshua K. Hefner (joshua@rkcqlaw.com)

**ATTORNEYS FOR DEFENDANT –
CSAA FIRE AND CASUALTY INSURANCE**

s/ Keith F. Givens _____